

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

**MOTION FOR DOWNWARD DEPARTURE FOR  
ACCEPTANCE OF RESPONSIBILITY**

Comes now the United States of America, by and through Leura Garrett Canary, United States Attorney for the Middle District of Alabama, and respectfully moves this Court to reduce by one (1) level defendant's offense level based on defendant's acceptance of responsibility. As grounds for this motion, the United States avers as follows:

1. A grand jury sitting in the Middle District of Alabama returned an indictment against defendant on August 3, 2005.
2. After his arrest, defendant notified the United States of his intent to plead guilty to the indictment and information sufficiently early to permit the government to avoid preparing for trial and to allocate its resources efficiently. Defendant pled guilty on January 17, 2006.
3. Therefore, pursuant to United States Sentencing Guidelines § 3E1.1(b), as amended, the United States makes this formal motion for a one-level reduction in defendant's offense level for acceptance of responsibility such that the total reduction in offense level for defendant's acceptance of responsibility shall be three (3) levels.

WHEREFORE, the United States respectfully requests that this motion be GRANTED.

Respectfully submitted this the 19<sup>th</sup> day of April, 2006.

LEURA GARRETT CANARY  
UNITED STATES ATTORNEY

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IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

UNITED STATES OF AMERICA )  
                                  )  
                                  )  
v.                              )      CR. NO. 3:05-CR-176-LSC  
                                  )  
DORIAN JEREMY RYANS        )

CERTIFICATE OF SERVICE

I hereby certify that on April 19th, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Jennifer Hart.

Respectfully submitted,

LEURA GARRETT CANARY  
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